



Eric Gonzalez
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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: PARADISE, LATOYA

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

MOS PARADISE WAS FOUND GUILTY AFTER DEPARTMENTAL TRIAL OF THE FOLLOWING NYPD CHARGES AND SPECIFICATIONS:

1. SAID MOS PARADISE, ON OR ABOUT MARCH 13, 2015, AT APPROXIMATELY 1325 HOURS, WHILE ASSIGNED TO THE TRANSIT BUREAU DISTRICT 33 AND ON DUTY, INSIDE THE BROADWAY JUNCTION "A/C/J/Z/L" SUBWAY STATION, KINGS COUNTY, WRONGFULLY USED FORCE, IN THAT WITHOUT POLICE NECESSITY, MOS PARADISE STRUCK A PERSON KNOWN TO THE NYPD WITH A BLUNT INSTRUMENT AND CAUSED SUCH PERSON TO HIT THEIR HEAD AGAINST A STEEL FENCE.

ACTION TAKEN: FORFEITURE OF 15 VACATION DAYS.

Disclosure #2:

A DISPOSITION OF GUILTY WAS ENTERED AGAINST MOS PARADISE FOR THE FOLLOWING NYPD DEPARTMENTAL CHARGES AND SPECIFICATIONS:

1. SAID MOS PARADISE, WHILE ON-DUTY, AND ASSIGNED TO TRANSIT BUREAU DISTRICT 33, ON APRIL 17, 2015, DID MAKE FALSE AND MISLEADING STATEMENTS DURING A CIVILIAN COMPLAINT REVIEW BOARD INTERVIEW, TO WIT: SAID MOS DENIED INTENTIONALLY HITTING A PERSON KNOWN TO THE NYPD WITH AN EMERGENCY GATE AND INSTEAD INDICATED THAT SHE TRIPPED AND WHILE ATTEMPTING TO CATCH HER BALANCE, THE EMERGENCY GATE ACCIDENTALLY MADE CONTACT WITH THE PERSON'S BODY.

ACTION TAKEN: ONE YEAR DISMISSAL PROBATION AND FOREFEITURE OF 15 VACATION DAYS.

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:

Disclosure # 3:

CCRB CASE: 201501948

REPORT DATE: 03/18/15

INCIDENT DATE: 03/13/15

CCRB SUBSTANTIATED ALLEGATION(S):

1. FORCE—OTHER BLUNT INSTRUMENT AS A CLUB
NYPD DISPOSITION—APU—GUILTY; NYPD PENALTY: 15 VAC DAYS

OTHER MISCONDUCT NOTED:

1. OMN—OTHER MISCONDUCT—OTHER MISCONDUCT

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